



Warren B. Wood  
General Counsel and Secretary

January 17, 2006

GC 06-0004  
File 45.019

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

Subject: ET Docket No. 05-345

Gentlemen:

Wolf Creek Nuclear Operating Corporation (WCNOC) supports the request for waiver of the eligibility rules for Low Power Auxiliary Stations (Part 74, Subpart H) filed jointly by Nuclear Energy Institute (NEI) and United Telecom Council (UTC). The request permits the continued operation of certain wireless headsets and intercom devices at nuclear power plants. This request is in the best interest of the public because it enhances worker safety and contributes to safe operation of nuclear power plants that use this equipment.

Communication is essential to the safe and efficient performance of a number of complex tasks during refueling and maintenance of nuclear power plants. Fuel handling operations, overhead crane operations, and maintenance activities in high radiation fields are just a few of the tasks requiring dependable communications. The following performance criteria are used to judge system performance.

- Hands-free operation
- Uninterrupted voice transmission (no drop)
- Full duplex
- High Fidelity clarity audio
- Contributes to ALARA (Nuclear Regulatory Commission requirement limiting an individual's radiation exposure to As Low As Reasonably Achievable)
- Avoidance of inadvertent actuation
- Multi-user

- Wireless
- Background noise rejection
- Moisture resistance
- Durability
- Ease/simplicity of use

The current selection of Telex equipment meets the exacting standards established for the challenging nuclear environment. WCNOC is aware of no other equipment that meets all of the above criteria.

There is no evidence that the use of the Telex equipment at nuclear power plants will cause any interference to eligible users' transmissions during operations.

WCNOC appreciates the opportunity to provide comments in support of the waiver and is available to answer questions concerning past or planned telecommunications equipment use.

Very truly yours,

A handwritten signature in black ink, appearing to read "Warren B. Wood". The signature is fluid and cursive, with the first name "Warren" and last name "Wood" being the most prominent parts.

Warren B. Wood